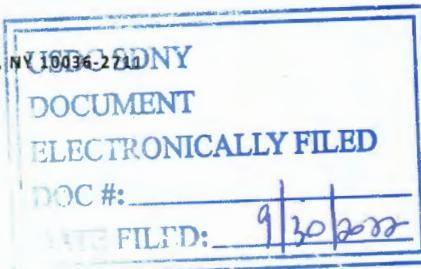


1155 AVENUE OF THE AMERICAS, NEW YORK, NY 10036-2710



JENNER & BLOCK LLP

September 29, 2022

Joseph J. Torres
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BY ECF

The Honorable Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

9/30/2022
If this motion
is heard promptly
it will likely be
denied at a before
the Case Management
Conference, which
will be in person,
not by telephone.

Re: *Disberry v. Employee Relations Committee of the Colgate-Palmolive Company; Alight Solutions, LLC; and the Bank of New York Mellon Corporation*
Case No. 22-CV-5778

Dear Judge McMahon:

MEMO ENDORSED

We write this letter jointly on behalf of all of the parties in the above referenced action in connection with the parties' September 29, 2022 deadline to submit a Civil Case Management Plan (ECF No. 21).

Pursuant to Paragraph 2 of the Court's July 20, 2022 Order Scheduling an Initial Pretrial Conference (ECF No. 17), the parties write to inform the Court that, after meeting and conferring, we are unable to come to an agreement on proposed deadlines in connection with the Court's template Civil Case Management Plan. We thus request that the December 8, 2022 initial telephonic conference not be cancelled.

On September 15, 2022, the Defendants filed separate motions to dismiss Plaintiff's complaint. Plaintiff's oppositions to the motions are due September 29, 2022, and Defendants' replies are due October 4, 2022. The Defendants seek a stay of the case deadlines until the Court decides the motions to dismiss as the outcome of the Court's decision may significantly change the scope of the lawsuit. Plaintiff does not agree to a complete stay of the deadlines given the uncertainty as to when a decision will be issued, but is amenable to a stay of the deadlines at least until December 8, 2022 or until a decision on the motions to dismiss, whichever is earlier. Thus, in lieu of the parties submitting a Civil Case Management Plan, the parties stipulate to a stay of case deadlines (other than those related to the pending motions) until December 8, 2022, and request an order confirming the Court's approval of this. The parties also respectfully request to attend the December 8, 2022 initial telephonic conference to further discuss whether a continued stay of the deadlines is appropriate, and the Civil Case Management Plan.

The Honorable Colleen McMahon
September 29, 2022
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Very truly yours,

/s/ Joseph J. Torres

Joseph J. Torres

cc: Counsel of Record (via ECF)